



August 7, 2017

**BY ELECTRONIC MAIL**

Bureau of Land Management  
Utah State Office  
Vernal Field Office  
Attn: Stephanie Howard  
170 South 500 East  
Vernal, Utah 84078  
blm\_ut\_vernal\_comments@blm.gov

**Re: Supplement to December 2017 Vernal Field Office Oil and Gas Lease Sale EA  
Comments, DOI-BLM-UT-GO10-2017-0028-EA**

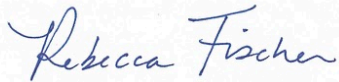
Dear Ms. Howard,

WildEarth Guardians is writing to supplement its July 24 comments on the December 2017 Vernal Field Office Oil and Gas Lease Sale EA because of recent actions by the Environmental Protection Agency on federal ozone standards.

On August 2, 2017, the EPA announced its withdrawal of a one-year extension of the states' obligations to promulgate initial area designations in compliance with the 2015 National Ambient Air Quality Standards for ozone. *See* Exhibit 1, EPA, *Withdrawal of Extension Deadline for Promulgating Designations for the 2015 Ozone National Ambient Air Quality Standards* (Aug. 2, 2017), available at [https://www.epa.gov/sites/production/files/2017-08/documents/ozone\\_extension\\_withdrawal\\_august\\_2\\_2017.pdf](https://www.epa.gov/sites/production/files/2017-08/documents/ozone_extension_withdrawal_august_2_2017.pdf); *see also*, EPA News Releases: EPA Continues to Work With States on 2015 Ozone Designations (Aug. 2, 2017), available at <https://www.epa.gov/newsreleases/epa-continues-work-states-2015-ozone-designations>. Due to this announcement, the EPA will now take action on the state of Utah's recommendation to designate Uinta and Duchesne Counties as in nonattainment with the 2015 ozone standard. EPA will very likely approve this recommendation. This determination will then trigger the BLM's obligation to undertake a "conformity" analysis before approving any new oil and gas leasing in Uinta and Duchesne Counties as required by the Clean Air Act. *See* 42 U.S.C. § 7506(c)(1).

Guardians expects that the BLM will fully comply with these obligations before approving the December 2017 lease sale because the EPA's ultimate approval of nonattainment is a reasonably foreseeable action under the National Environmental Policy Act. *See* 40 C.F.R. § 1508.7. Guardians looks forward to hearing back from the BLM on this issue.

Sincerely,



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